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February 10, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States Courthouse, Courtroom 14A
500 Pearl Street
New York, NY 10007

Re: Grant et al. v. Trump et al., Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

This firm represents defendants Donald J. Trump and Donald J. Trump For President, Inc. in the above-referenced action. We write with consent from plaintiffs Edmond Grant p/k/a “Eddy Grant”, Greenheart Music Limited, and Greenheart Music Limited, and pursuant to Your Honor’s Individual Practices Rule I.E. to request an extension of time until April 24, 2023 for the parties to complete expert discovery.

This is the first request for an extension of the expert discovery period.

Although the parties indicated in the proposed case management plan and report of Rule 26(f) meeting filed November 2, 2021, that they did not anticipate the use of experts, Plaintiffs’ counsel recently informed Defendants that an expert report was forthcoming. Plaintiffs agreed to serve the report on January 23rd, then requested an extension to February 10th, and yesterday requested an additional three days to serve the report. As a courtesy, and in the spirit of cooperation in discovery matters, Defendants consented to the extensions. Defendants now seek an extension of the expert discovery period until April 24, 2023 in order to allow for sufficient time under Rule 26 to prepare a rebuttal expert report and for the parties to take depositions of the respective expert witnesses.

February 10, 2023
Page 2 of 2

We thank the Court for its attention to this matter.

A handwritten signature in blue ink, appearing to read "Darren W. Saunders". The signature is fluid and cursive, with the first name "Darren" being more prominent.

Respectfully,

Darren W. Saunders

cc: All counsel of record (via ECF)
